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September 12, 2020

Via ECF

The Honorable Kenneth M. Karas
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Re: ***United States v. Nicholas Tartaglione***
16 Cr. 832 (KMK)

Dear Judge Karas:

I am writing to immediately appraise the Court of the conditions Mr. Tartaglione was confronted with upon his return to MCC and to quarantine after Court yesterday. He was put in a cell without the books and newspapers he was given on Thursday (no doubt in advance of the government's letter filed last night opposing our request to have Mr. Tartaglione moved from the MCC). Worse, he was placed into a cell without a working toilet. He was given a bucket! He was told to use that until the toilet was repaired.

We will write a more detailed rebuttal to the Government's letter, but we thought this incident was worthy of the Court's immediate attention. Obviously, we want Mr. Tartaglione moved today to a cell with a working toilet (a request I can't believe I have to make in the SDNY in 2020) and to have his books and newspapers given to him.

Respectfully,

/s/ Bruce A. Barket
Bruce A. Barket

cc: *via ECF*
All counsel